

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SHEILA J. PORTER

Plaintiff,

v.

ANDREA CABRAL, SUFFOLK COUNTY
SHERIFF'S DEPARTMENT, SUFFOLK
COUNTY and CORRECTIONAL MEDICAL
SERVICES, INC.

Defendants.

Civil Action No. 04-11935-DPW

**SHEILA J. PORTER'S UNOPPOSED MOTION TO EXTEND DEADLINE TO
RESPOND TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT**

Now comes Plaintiff Sheila J. Porter, by and through undersigned counsel, and respectfully requests that this Court extend the deadline for her to respond to Defendants' Motions for Summary Judgment by two weeks, to November 14, 2005. Counsel for Defendants do not oppose this motion. As grounds therefore, Mrs. Porter states as follows:

1. On October 17, 2005, Defendants Andrea Cabral, Suffolk County Sheriff's Department and Suffolk County ("Suffolk Defendants") and Correctional Medical Services, Inc. ("CMS") each filed Motions for Summary Judgment.
2. Pursuant to the Amended Scheduling Order and Local Rule 7.1(B)(2), Mrs. Porter's Oppositions to these motions are due on October 31, 2005.
3. Counsel for Mrs. Porter has an arbitration in another matter beginning on October 31st. The arbitration is scheduled to last the entire week. Thus, counsel will be unable to devote the time necessary to respond to the two motions, which involve complex legal and factual issues.

4. Counsel anticipates that the requested extension will not prejudice any party and will require only minor adjustments, if any, to the Court's schedule.

5. Counsel for Mrs. Porter has conferred with counsel for Defendants and neither object to the instant Motion.

WHEREFORE, Mrs. Porter requests that the Court grant a two-week extension for her to respond to the parties' Motions for Summary Judgment such that her responses would be due on November 14, 2005.

Respectfully Submitted

SHEILA J. PORTER

By her attorneys,

/s/ David Schumacher
Joseph F. Savage Jr. (BBO #443030)
David S. Schumacher (BBO #647917)
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Dated: October 20, 2005

CERTIFICATION UNDER LOCAL RULE 7.1

I, David S. Schumacher, hereby certify that counsel for Sheila Porter conferred with counsel for the Defendants and they do not oppose the instant Motion.

Dated: October 20, 2005

David S. Schumacher
David S. Schumacher

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